



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5

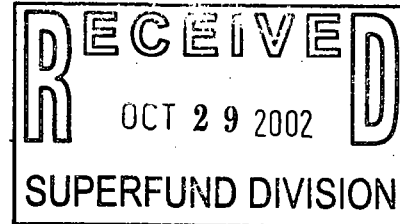


446664

OCT 8 2002

Basic Packaging Machinery Corp.
642 Sugar Lane
Elyria, OH 44035

REPLY TO THE ATTENTION OF:



Re: Chemical Recovery Systems Superfund Site in Elyria, Ohio

This letter is being sent to all identified potentially responsible parties (PRPs) at the Chemical Recovery Systems Superfund Site (Site) located in Elyria, Ohio. I am enclosing with this letter a copy of the volumetric ranking prepared for this Site by U.S. EPA and its contractor, TechLaw Inc. This copy of the volumetric ranking enclosed is the most recent revision of this document, incorporating all comments and new information received.

The information contained in this document does not constitute a non-binding preliminary allocation of responsibility under CERCLA section 122 (e) (3). Neither this information nor any other product of this volumetric ranking project should be construed as an allocation of responsibility or liability by EPA. This document and all associated documents are provided solely for your information. The information conveyed by this document should be considered as preliminary and subject to revisions based upon new information as, and if, any such new information becomes available.

The earliest version of this volumetric ranking was based solely on the "dirty inventory" lists prepared by the Site's operators during the late 1970s and therefore only included the evidence presented in those lists. The more recent revisions of the ranking, of which the enclosed ranking is the latest iteration, have been based on all the available documentary evidence, including all of the accounting records kept by the Site operators (*i.e.*, accounts payable ledgers, accounts receivable ledgers, purchase payment journals, the correspondence files of the Site operators) as well as the admissions made to U.S. EPA by PRPs, in the form of responses to CERCLA Section 104(e) information requests, regarding spent solvent sent to the Site. U.S. EPA believes the enclosed ranking to be the most complete and accurate estimate of the relative quantities sent to the Site by the PRPs, based on all the available information.

In addition to the volumetric ranking itself, I am enclosing a narrative document which summarizes the assumptions TechLaw used, with U.S. EPA approval, in its evaluation of the raw data presented by the accounting records kept by the Site operators and such additional data as became available through the medium of PRP responses to information requests generated by the Agency pursuant to Section 104(e) of CERCLA. This Assumptions Summary was created to

give an account of how TechLaw handled, considered, weighed and evaluated the data in order to develop the volumetric ranking.

The computer databases which TechLaw developed to display the digitized information from the accounting records, together with associated tables created from those databases to analyze the data, were burned onto a compact disk by TechLaw. A copy of that CD is available from the Agency upon request. If you wish to have a copy of that CD, please call Deena Sheppard-Johnson at 312-886-7048.

Finally, a third document is enclosed, the most recent iteration of the combined PRP list for this Site. This list includes all parties that have been identified as PRPs and which the Agency still considers to be PRPs at this Site. Since this list was last revised and circulated to all PRPs, several parties have been dropped while others have been added.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas C. Nash".

Thomas C. Nash
Associate Regional Counsel

enclosures

cc: Deena Sheppard-Johnson, SR-6J

Volumetric Ranking

Includes Dirty Inventory, 104(e) Responses, Accounting Records and Scrap Solvent Charges

Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
484,706.62	8.683%	Sherwin Williams Co.	<input checked="" type="checkbox"/>
347,656.74	6.228%	C & C Supply Co.	<input type="checkbox"/>
302,236.99	5.414%	PPG Industries, Inc.	<input checked="" type="checkbox"/>
259,494.00	4.648%	Robert Ross & Sons, Inc.	<input checked="" type="checkbox"/>
252,335.55	4.520%	Ashland Chemical Co.	<input checked="" type="checkbox"/>
244,555.08	4.381%	Avery Dennison	<input checked="" type="checkbox"/>
231,645.52	4.150%	Uniroyal, Inc.	<input checked="" type="checkbox"/>
206,857.25	3.706%	Chemical Recovery Systems, Inc.	<input checked="" type="checkbox"/>
180,179.06	3.228%	N S Marketing, Inc.	<input type="checkbox"/>
142,712.73	2.556%	Goodyear Tire & Rubber Co.	<input checked="" type="checkbox"/>
141,745.32	2.539%	General Motors	<input checked="" type="checkbox"/>
137,400.00	2.461%	Celanese Coatings	<input checked="" type="checkbox"/>
117,976.21	2.113%	Jamestown Paint & Varnish Co.	<input checked="" type="checkbox"/>
108,082.03	1.936%	E. F. Hauserman Co.	<input type="checkbox"/>
80,880.67	1.449%	Yenkin Majestic	<input checked="" type="checkbox"/>
79,340.00	1.421%	General Tire & Rubber Co.	<input checked="" type="checkbox"/>
75,923.07	1.360%	Alside, Inc.	<input checked="" type="checkbox"/>
75,646.00	1.355%	Gordon Terminal Service Co.	<input checked="" type="checkbox"/>
73,100.00	1.309%	Hexcel Corporation	<input checked="" type="checkbox"/>
70,698.39	1.266%	B. F. Goodrich	<input checked="" type="checkbox"/>
65,156.99	1.167%	Chem Central	<input checked="" type="checkbox"/>
64,373.00	1.153%	Checkmate Boats	<input checked="" type="checkbox"/>
59,418.57	1.064%	Elwin G. Smith	<input checked="" type="checkbox"/>
52,856.10	0.947%	Dow Chemical	<input checked="" type="checkbox"/>
51,100.00	0.915%	Ecology Chemical	<input type="checkbox"/>
50,926.93	0.912%	Lake Shore Industries	<input checked="" type="checkbox"/>
50,567.44	0.906%	Dexter Corporation	<input checked="" type="checkbox"/>
45,964.97	0.823%	Whirlpool Corp.	<input checked="" type="checkbox"/>
45,165.00	0.809%	Body Brothers	<input type="checkbox"/>
43,159.66	0.773%	Basic Packaging Systems	<input checked="" type="checkbox"/>
38,363.93	0.687%	Ball Chemical Co.	<input checked="" type="checkbox"/>
35,567.50	0.637%	Dupont	<input checked="" type="checkbox"/>
34,400.00	0.616%	Carter Oil Co.	<input type="checkbox"/>
32,230.93	0.577%	Cuyahoga Chemical Co.	<input checked="" type="checkbox"/>
31,479.19	0.564%	F.B.C. Corp.	<input checked="" type="checkbox"/>

-REVISED DRAFT-

Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
31,195.71	0.559%	Beaver Paint Co.	<input checked="" type="checkbox"/>
30,012.64	0.538%	Mobil Chemical Co.	<input checked="" type="checkbox"/>
28,142.63	0.504%	Bison Corp.	<input checked="" type="checkbox"/>
27,594.82	0.494%	Beazer East	<input checked="" type="checkbox"/>
27,315.49	0.489%	Fisher Price Toys	<input checked="" type="checkbox"/>
25,905.60	0.464%	Ohio Formulators	<input type="checkbox"/>
25,540.29	0.458%	American Chemsol	<input type="checkbox"/>
25,336.24	0.454%	Artesian Industries	<input checked="" type="checkbox"/>
25,193.35	0.451%	Nortru	<input checked="" type="checkbox"/>
24,905.48	0.446%	Eagle Rubber Co.	<input checked="" type="checkbox"/>
24,634.00	0.441%	Mr. Mike Geregach	<input type="checkbox"/>
24,298.24	0.435%	Firestone Tire & Rubber Co.	<input checked="" type="checkbox"/>
24,002.20	0.430%	Technical Coatings	<input type="checkbox"/>
22,720.00	0.407%	Ford Motor Company	<input checked="" type="checkbox"/>
19,850.08	0.356%	Nordson Corporation	<input checked="" type="checkbox"/>
19,443.00	0.348%	Owens Illinois	<input checked="" type="checkbox"/>
18,587.11	0.333%	Chrysler Plastic Products	<input checked="" type="checkbox"/>
17,855.39	0.320%	Limbacher Paint & Color	<input checked="" type="checkbox"/>
17,414.50	0.312%	Bud Industries, Inc.	<input checked="" type="checkbox"/>
17,259.21	0.309%	Hysol Division	<input checked="" type="checkbox"/>
16,862.27	0.302%	Sinclair & Valentine	<input checked="" type="checkbox"/>
16,500.00	0.296%	Ecology Chemical & Refining	<input type="checkbox"/>
15,282.59	0.274%	Hoover Co., The	<input checked="" type="checkbox"/>
15,100.00	0.270%	Shell Chemical Co.	<input checked="" type="checkbox"/>
15,000.00	0.269%	C. D. Cottrell	<input type="checkbox"/>
14,884.20	0.267%	Browning Ferris Industries	<input checked="" type="checkbox"/>
14,883.90	0.267%	Virdeh Lighting	<input type="checkbox"/>
14,630.00	0.262%	Young Environmental Services	<input type="checkbox"/>
14,443.00	0.259%	International Fabricators, Inc.	<input type="checkbox"/>
14,161.95	0.254%	Chemical Solvents	<input type="checkbox"/>
13,455.00	0.241%	Dow Corning	<input checked="" type="checkbox"/>
13,385.36	0.240%	Whittaker Corp.	<input type="checkbox"/>
13,299.65	0.238%	H. H. Robertson Co.	<input checked="" type="checkbox"/>
13,126.64	0.235%	Nol/Wood Chemical	<input checked="" type="checkbox"/>
13,000.00	0.233%	Plasti-Kote Co.	<input checked="" type="checkbox"/>
12,553.81	0.225%	Clyde Paint & Supply	<input checked="" type="checkbox"/>
11,565.47	0.207%	Conneaut Leather, Inc.	<input checked="" type="checkbox"/>
11,348.46	0.203%	Carmac Chemical	<input checked="" type="checkbox"/>
10,948.13	0.196%	Ohio Dept. of Transportation	<input checked="" type="checkbox"/>

-REVISED DRAFT-

Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
10,700.00	0.192%	DeSantis Coatings	<input checked="" type="checkbox"/>
10,670.00	0.191%	Kenner Toys	<input checked="" type="checkbox"/>
10,390.67	0.186%	Technical Products, Inc.	<input checked="" type="checkbox"/>
10,277.90	0.184%	Masonite Corp.	<input checked="" type="checkbox"/>
10,125.96	0.181%	Conap, Inc.	<input checked="" type="checkbox"/>
9,955.00	0.178%	J.T. Young	<input type="checkbox"/>
9,897.00	0.177%	Jack Webb	<input type="checkbox"/>
9,891.01	0.177%	Western Electric Co.	<input type="checkbox"/>
9,142.15	0.164%	E. E. Zimmerman	<input type="checkbox"/>
9,135.12	0.164%	Borden Chemical	<input checked="" type="checkbox"/>
9,111.00	0.163%	Continental Can Co.	<input checked="" type="checkbox"/>
8,916.00	0.160%	Industrial Reclamation	<input type="checkbox"/>
8,710.00	0.156%	Glidden Company, The	<input checked="" type="checkbox"/>
8,705.62	0.156%	Hobart Corp.	<input checked="" type="checkbox"/>
8,680.53	0.155%	Chemical Distributors, Inc.	<input checked="" type="checkbox"/>
8,299.20	0.149%	Cambridge Coatings, Inc.	<input type="checkbox"/>
7,829.35	0.140%	Neville Chemical	<input checked="" type="checkbox"/>
7,808.00	0.140%	Bucyrus Erie	<input checked="" type="checkbox"/>
7,726.22	0.138%	Miller Studio	<input checked="" type="checkbox"/>
7,534.00	0.135%	Imaging Systems Corp.	<input type="checkbox"/>
7,460.24	0.134%	Techno-Adhesives	<input checked="" type="checkbox"/>
7,370.57	0.132%	Franklin Chemical	<input checked="" type="checkbox"/>
7,353.53	0.132%	W. J. Ruscoe Co.	<input checked="" type="checkbox"/>
7,206.00	0.129%	Mid American	<input type="checkbox"/>
6,990.85	0.125%	Republic Steel	<input checked="" type="checkbox"/>
6,944.00	0.124%	Unico	<input type="checkbox"/>
6,588.00	0.118%	Borg-Warner	<input checked="" type="checkbox"/>
6,528.14	0.117%	General Electric	<input checked="" type="checkbox"/>
6,500.00	0.116%	Solvent Resource Recovery	<input type="checkbox"/>
6,435.00	0.115%	Rockwell International	<input checked="" type="checkbox"/>
6,340.20	0.114%	Hukill Chemical Corp.	<input checked="" type="checkbox"/>
6,172.01	0.111%	Ferriot Brothers, Inc.	<input checked="" type="checkbox"/>
6,000.00	0.107%	Systems Technology Corp.	<input type="checkbox"/>
5,971.30	0.107%	Lorain Products	<input checked="" type="checkbox"/>
5,710.18	0.102%	J C Whitlam Mfg.	<input checked="" type="checkbox"/>
5,703.08	0.102%	Superior Industries	<input type="checkbox"/>
5,540.00	0.099%	Calig Steel Drum	<input type="checkbox"/>
5,414.14	0.097%	Randall Company	<input type="checkbox"/>
5,349.90	0.096%	Studebaker Chemical	<input type="checkbox"/>

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Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
5,198.76	0.093%	Victor Comptometer Corp.	<input checked="" type="checkbox"/>
5,065.00	0.091%	Therm-o-disc	<input checked="" type="checkbox"/>
4,976.70	0.089%	Erie Universal	<input type="checkbox"/>
4,556.72	0.082%	Kalcor Coatings Co.	<input checked="" type="checkbox"/>
4,490.00	0.080%	Chemtrol	<input checked="" type="checkbox"/>
4,467.02	0.080%	Airborne Manufacturing	<input checked="" type="checkbox"/>
4,455.00	0.080%	Liberty Solvents and Chemicals	<input checked="" type="checkbox"/>
4,400.00	0.079%	Canton Wood Products	<input type="checkbox"/>
4,400.00	0.079%	Soil Services	<input type="checkbox"/>
4,290.00	0.077%	U S Chemical	<input checked="" type="checkbox"/>
4,200.00	0.075%	Dietz Barge Cleaning Service	<input type="checkbox"/>
4,167.00	0.075%	Temperature Controls	<input checked="" type="checkbox"/>
4,125.00	0.074%	Quikut	<input checked="" type="checkbox"/>
4,048.27	0.073%	Elyria Foundry Division	<input checked="" type="checkbox"/>
4,000.00	0.072%	Browning Mfg.	<input type="checkbox"/>
4,000.00	0.072%	3M Corp.	<input checked="" type="checkbox"/>
3,950.00	0.071%	Stanadyne, Inc.	<input checked="" type="checkbox"/>
3,892.71	0.070%	Ohio Brass	<input checked="" type="checkbox"/>
3,850.00	0.069%	Dorn Color, Inc.	<input checked="" type="checkbox"/>
3,841.39	0.069%	Mathco Chemical Co., The	<input type="checkbox"/>
3,809.00	0.068%	Berenfield Steel Drum	<input checked="" type="checkbox"/>
3,796.00	0.068%	Paul Moffat	<input type="checkbox"/>
3,785.09	0.068%	Gerstanslager	<input type="checkbox"/>
3,483.35	0.062%	Sherman Research Labs	<input type="checkbox"/>
3,299.40	0.059%	Wooster Brush Company, The	<input checked="" type="checkbox"/>
3,272.00	0.059%	McKesson Chemical	<input type="checkbox"/>
3,270.27	0.059%	Astlett Balata Refining	<input type="checkbox"/>
3,249.86	0.058%	Mameco International	<input checked="" type="checkbox"/>
3,228.37	0.058%	Cameo, Inc.	<input type="checkbox"/>
3,000.00	0.054%	Painesville Nuclear Plant	<input checked="" type="checkbox"/>
2,943.65	0.053%	Mahoning Paint Co.	<input checked="" type="checkbox"/>
2,886.01	0.052%	Stolle	<input checked="" type="checkbox"/>
2,861.13	0.051%	Astatic Corp.	<input checked="" type="checkbox"/>
2,802.56	0.050%	Randall Division	<input type="checkbox"/>
2,778.00	0.050%	Airco Speer Electronics	<input checked="" type="checkbox"/>
2,750.00	0.049%	American Greeting	<input checked="" type="checkbox"/>
2,718.46	0.049%	National Acme	<input checked="" type="checkbox"/>
2,640.00	0.047%	TRW	<input checked="" type="checkbox"/>
2,640.00	0.047%	Molded Fiberglass	<input checked="" type="checkbox"/>

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Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
2,620.00	0.047%	Foseco, Inc.	<input checked="" type="checkbox"/>
2,497.76	0.045%	Interstate Chemical Co.	<input type="checkbox"/>
2,349.80	0.042%	Allegheny Label Co.	<input checked="" type="checkbox"/>
2,311.50	0.041%	Bailey Meter Co.	<input type="checkbox"/>
2,200.00	0.039%	O'Sullivan Corp. S.C.	<input type="checkbox"/>
2,200.00	0.039%	Eastman Kodak	<input checked="" type="checkbox"/>
2,145.00	0.038%	Plas-Tanks Industries, Inc.	<input checked="" type="checkbox"/>
2,078.88	0.037%	Reinforced Plastic Services	<input type="checkbox"/>
2,009.67	0.036%	Fischer Chemical Co.	<input type="checkbox"/>
2,000.00	0.036%	Great Lakes Terminal	<input checked="" type="checkbox"/>
1,992.05	0.036%	Luxaire, Inc.	<input checked="" type="checkbox"/>
1,984.83	0.036%	Adelphia, Inc.	<input checked="" type="checkbox"/>
1,958.58	0.035%	Chemical Stripping	<input type="checkbox"/>
1,925.00	0.034%	Rowland Products - Wilson Freight	<input type="checkbox"/>
1,778.00	0.032%	Parke-Davis & Co.	<input checked="" type="checkbox"/>
1,706.52	0.031%	Rusco Industries	<input type="checkbox"/>
1,705.00	0.031%	Shiloh Metal	<input type="checkbox"/>
1,689.00	0.030%	Chemetron Process Equip.	<input type="checkbox"/>
1,663.10	0.030%	R. W. Beckett Corp.	<input checked="" type="checkbox"/>
1,612.91	0.029%	Marlite Division	<input checked="" type="checkbox"/>
1,605.19	0.029%	Superior Chemical Products	<input type="checkbox"/>
1,571.44	0.028%	Taylor Metal	<input checked="" type="checkbox"/>
1,553.80	0.028%	Gunnison Brothers, Inc.	<input type="checkbox"/>
1,400.00	0.025%	West Side Lumber & Concrete	<input type="checkbox"/>
1,320.50	0.024%	Chemtron	<input checked="" type="checkbox"/>
1,292.50	0.023%	Rexroth Corp.	<input checked="" type="checkbox"/>
1,267.00	0.023%	Universal Cooperatives	<input checked="" type="checkbox"/>
1,210.00	0.022%	Clark Equipment Co.	<input checked="" type="checkbox"/>
1,194.00	0.021%	Rudi Gusley	<input type="checkbox"/>
1,167.00	0.021%	City Salvage	<input type="checkbox"/>
1,142.35	0.020%	Addressograph/Multigraph	<input type="checkbox"/>
1,100.00	0.020%	Auto & Industrial Finishes	<input checked="" type="checkbox"/>
1,100.00	0.020%	Barr, Inc.	<input checked="" type="checkbox"/>
1,078.20	0.019%	Ken's Woodcraft	<input type="checkbox"/>
1,045.00	0.019%	American Colors, Inc.	<input checked="" type="checkbox"/>
1,000.00	0.018%	Superior Screw	<input checked="" type="checkbox"/>
990.00	0.018%	Pioneer Balloon Company	<input type="checkbox"/>
933.00	0.017%	Pram Incorporated	<input type="checkbox"/>
889.00	0.016%	P&K Oil Service, Inc.	<input checked="" type="checkbox"/>

-REVISED DRAFT-

Total Volume (gallons)	Percent of Grand Total	PRP name	Named PRP
771.00	0.014%	F.J. Egner, & Son, Inc.	<input type="checkbox"/>
759.00	0.014%	Hyman Co., The	<input type="checkbox"/>
733.00	0.013%	Kasper Foundry	<input type="checkbox"/>
707.00	0.013%	Industrial Chemical Corp.	<input checked="" type="checkbox"/>
694.00	0.012%	Edward Nemeth	<input type="checkbox"/>
694.00	0.012%	National Can	<input checked="" type="checkbox"/>
672.68	0.012%	Perry Plastics, Inc.	<input type="checkbox"/>
667.00	0.012%	Bob Deckelman	<input type="checkbox"/>
634.09	0.011%	Thomas Steel Strip Corp.	<input checked="" type="checkbox"/>
550.00	0.010%	Quality Synthetic Rubber	<input checked="" type="checkbox"/>
495.00	0.009%	Standard Injection Molding	<input type="checkbox"/>
489.10	0.009%	Bacharach Instrument Co.	<input type="checkbox"/>
481.19	0.009%	Ashland Rubber Products	<input type="checkbox"/>
440.00	0.008%	Tropical Paint	<input type="checkbox"/>
400.00	0.007%	Norwalk Thermostat	<input type="checkbox"/>
395.70	0.007%	Tom Sugasky	<input type="checkbox"/>
388.59	0.007%	Ruscoe, Meadville	<input type="checkbox"/>
335.00	0.006%	Mobay Chemical	<input type="checkbox"/>
332.08	0.006%	Duplex Mfg. & Foundry Co.	<input type="checkbox"/>
278.00	0.005%	Gary Crosby	<input type="checkbox"/>
275.00	0.005%	Schuman Paint & Sandblasting	<input type="checkbox"/>
229.64	0.004%	Woodall Industries	<input type="checkbox"/>
224.52	0.004%	Kohler Co.	<input type="checkbox"/>
189.61	0.003%	Tecumseh Products Co.	<input checked="" type="checkbox"/>
165.00	0.003%	Century Plastics	<input type="checkbox"/>
153.43	0.003%	Buffalo Molded Plastics	<input type="checkbox"/>
151.23	0.003%	Allis Chalmers	<input checked="" type="checkbox"/>
150.00	0.003%	International Amalgamated Thingmakers	<input type="checkbox"/>
139.00	0.002%	Crobaugh Laboratories	<input type="checkbox"/>
119.39	0.002%	Hydro Tube Corp.	<input type="checkbox"/>
110.00	0.002%	Chautauqua Chemical	<input type="checkbox"/>
67.00	0.001%	Aztec Chemicals	<input type="checkbox"/>
28.81	0.001%	Casper Foundry	<input type="checkbox"/>
3.69	0.000%	Brentwood Hospital	<input type="checkbox"/>

Grand Total (gallons)

5,582,415.74

-REVISED DRAFT-

Monday, September 30, 2002

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CHEMICAL RECOVERY SYSTEMS
Waste-In List Assumptions Summary
-DRAFT -
September 30, 2002

1. Summary

In order to calculate total volumes for each potentially responsible party (PRP) at the site, TechLaw, Inc. (TechLaw) digitized and formatted all site evidentiary information for entry in a single database (Waste-In List). Site evidentiary information includes Chemical Recovery Systems (CRS) accounting records; entries on the CRS Dirty Inventory (DI) list; affidavits and witness statements; or evidence provided by PRPs in their 104(e) response.

Site evidentiary documents are presented in different formats. For example, the CRS DI list provides volumes of waste quantified in drums, gallons, or pounds, whereas the CRS accounting records provide a dollar amount transaction. The affidavit and witness statements generally provide only company names, and the PRP 104(e) responses provide evidentiary information in various formats. In order to calculate a total amount of waste in gallons for each PRP, TechLaw converted all CRS DI, CRS accounting records and PRP 104(e) response transactions to gallons.

TechLaw analyzed the various site evidence to determine if a PRP has an reasonable evidentiary nexus to the site. Evidentiary nexus was established if a PRP appeared on CRS accounting records itemized with sludge disposal charges; scrap solvent transactions; a PRP's inclusion on the CRS DI list; a PRP's inclusion in an affidavit or witness statement that provides evidence that a PRP disposed of waste at the CRS site; or if evidence was provided by a PRP in their 104(e) response. TechLaw only included PRPs in the waste-in calculations where a nexus to the site was established.

The Waste-In database is separated into two reports. The first report includes 104(e) responses, Dirty Inventory quantities, and Accounts Receivable conversions. Due to the complexity of the data and conversions, a second report was created which only includes conversions from Scrap Solvent entries in the purchase payment journals. Total volumes and percentages from each of these waste-in reports are then combined and included as a grand total in the Volumetric Inventory.

TechLaw conducted standard volumetric calculations on the site evidence utilizing assumptions and guidance presented in OSWER Directive No. 9835.16, *EPA Final Guidance on Preparing Waste-in Lists and Volumetric Rankings for Release to Potentially Responsible Parties (PRPs) under CERCLA*, dated February 22, 1991.

The following assumptions generally document and augment protocols as presented in the Waste-in List / Volumetric Ranking Technical Approach, Chemical Recovery Systems, Elyria, Ohio, December 5, 2001.



2. Dirty Inventory Volumetric Calculations

TechLaw entered data from the DI lists into the Waste-In List, eliminating redundant entries from subsequent DI lists. In the Waste-In List, "DI" indicates volumetric information obtained from the CRS DI lists. All attempts were made by TechLaw to enter data verbatim as shown on the evidentiary documents.

TechLaw converted the entries on the DI list to gallons utilizing standard EPA conversion factors as described in Attachment 2 of OSWER Directive No. 9835.16. Conversion factors which were utilized include: 1 drum is equal to 55 gallons, 1 pail is equal to 5 gallons, and 1 pound is equal to 0.125 gallons.

TechLaw made several case specific assumptions during the volumetric calculation from the DI lists. Specific examples of these adjustments include:

- Certain DI entries do not appear to correspond to the shipment of hazardous chemicals. Examples include entries for an "I-Beam," a "drum crusher," empty or "MTS" drums, reconditioned drums, etc. TechLaw omitted these entries from the volumetric calculation.
- Similarly, TechLaw determined certain shipments of chemicals on the DI list appear to be non-hazardous. Examples from the DI include "calcium chloride flakes," "calcium chloride," and "Liquid Caustic," etc. TechLaw omitted these entries from the volumetric calculation.
- Where a specific DI entry failed to list a quantity of waste, TechLaw assumed the contribution was zero gallons.
- EPA and TechLaw evaluated disputed quantities/entries on the DI list on a case by case basis. For example, a "Yenkin Majestic" entry for 6,000 "drs." of xylene (a one day transaction of 330,000 gallons) likely represents an unrealistic quantity and does not correlate to similar ledger entries by Yenkin or similar PRPs. In this case, TechLaw assumed the transaction was 6,000 *gallons* of xylene. In other cases where the DI list attributed a single one-day shipment of thousands of drums by an individual PRP, TechLaw assumed the alleged drums were actually gallons. All TechLaw adjustments are presented in the Waste-In List.

3. 104(e) Response Volumetric Calculations

TechLaw also entered information which indicated a contribution of materials to the site from the PRP 104(e) responses into the Waste-In List. In the Waste-In List, "104(e)" indicates volumetric information provided by 104(e) responses. In order to avoid redundant entries, TechLaw first compared each 104(e) transaction to the CRS DI lists to ensure it was not the same transaction. TechLaw omitted redundant entries from the volumetric calculation. PRP 104(e) responses containing transactional information, including specific volume and cost, were also utilized in



determining proxy values. These 104(e) entries are included in Table 1. Proxy value calculations are discussed in more detail in Section 5 below.

Generally, 104(e) responses contained shipping records, invoices, and other accounting records. Please note that every 104(e) response differed in the amount and type of data that was submitted. Therefore, TechLaw evaluated volumetric evidence on a case by case basis. PRP responses with specific volumetric information were entered into the Waste-In List. Responses which required additional TechLaw analysis and assumptions are summarized below:

- Dorn Color: The 104(e) response indicates that Obitts Chemical Company picked up approximately two 55 gallon drums of wash solvent every three to four weeks from 1975 (possibly late 1974) to sometime in 1977. TechLaw assumed a shipment of two 55-gallon drums (110 gallons) of wash solvent every 3.5 weeks, totaling approximately 14 shipments (1,540 gallons) per year. The volumetric calculation which was entered into the Waste-In List included 1,540 gallons for both 1975 and 1976 and 770 gallons (one-half year) for 1977, totaling 3,850 gallons attributed to the PRP.
- Goodyear: For transactions in the DI which list a waste shipment in pounds, TechLaw used a default conversion factor of 0.125 gallons per pound. However, on the 8/15/80 Goodyear transaction, a specific gallonage was supplied on the Goodyear 104(e) response that differed from the quantity on the CRS DI list. Therefore, TechLaw utilized the specific gallonage of 6,500 gallons in the Waste-In List. In other cases where only pounds were known, TechLaw used the default conversion factor of 0.125 gallons per pound.
- PPG: According to the Eckhard Survey included in the 104(e) response, PPG contributed approximately 200 tons of waste to the site between 1977 and 1979. CRS DI entries over the same time period total a number greater than 200 tons. Lacking more specific information, it is assumed that much of this quantity from the Eckhard survey is captured in the CRS DI and accounting entries over the same time period. Therefore, TechLaw did not add additional volume based on the 104(e).
- Rexroth: PRP included a generally illegible debit and shipper memo from 8/28/80 for drums of "111 trichloroethane." Although illegible, this may potentially be 18 drums. TechLaw observed three DI entries on 8/26/80 for this PRP totaling 23.5 drums of "trichloroethane." As these are similar transactions on similar dates, and lacking a legible quantity shipped, TechLaw assumed these were the same transaction.
- WJ Ruscoe: The only 104(e) admissions relate to shipping invoices. Based on the CRS DI entries and the shipping invoices, it appears that CRS would pick up dirty solvent and sludge, and return reclaimed solvents. The 8/31/79 invoice may correspond with a 8/10/79 CRS DI entry for 23 drums. The 8/31/79 invoice includes charges for 16 drums of wash thinner and 385 gallons (7 drums) of sludge, which total 23 drums. Sales receipts included in the 104(e) response were included in the Waste-In List, assuming the return shipment of reclaimed solvent was equal to the presumed initial shipment of dirty solvent.



4. Accounts Receivable Volumetric Calculations

TechLaw entered transactions from the CRS Accounts Receivable (AR) ledgers into the Waste-In List. TechLaw initially entered all AR transactions into the Waste-In List. However, AR records were only utilized in waste-in calculations if the EPA established that a PRP had an evidentiary nexus to the site. Specific to Accounts Receivable, records which indicated “sludge disposal” charges were utilized for nexus information. Other nexus information includes the CRS DI, other CRS accounting records, affidavits and witness statements, and PRP 104(e) responses. Please note that once nexus information was established for a PRP, all AR transactions for that PRP were utilized in the waste-in calculations. TechLaw identified CRS Accounts Receivable by “AR” in the Waste-In List. Additional assumptions generated by TechLaw during analysis of AR records are listed below:

- The headings of the itemized charges in the CRS AR ledgers changed over time. From 1965 to 1973, all itemized charges were recorded in a column entitled “Other.” In 1975 and 1976, the columns were broken down into “Freight,” “Drum or Cleaning” and “Misc.” From 1977 to 1979, the columns read “Misc.,” “Drum Charge” and “Sludge Disposal.” TechLaw assumed that “Drum or Cleaning” was the same as “Drum Charge.” The charges under the “Other” column were entered under the “Misc.” column. Detailed entries for all accounting records are contained in Table 2. Summarized volume conversions for the accounting records are provided in the Waste-In List.
- The 1980 AR records did not contain itemized charges for drum charge or sludge disposal. However, TechLaw entered these entries into Table 2 if the PRP had other nexus information to the site.
- The miscellaneous charges in the CRS AR ledgers usually contained a description in parentheses adjacent to the charge amount. TechLaw entered these descriptions into the comments column in Table 2.
- Voided entries were not included in the Waste-In List.
- If a dollar amount was not provided in the CRS ledger, the entry was not included in the Waste-In List.
- There were two entries identified as “Cash Sale” in the CRS AR records: one entry on 5/6/75 and one entry on 6/5/78. Since these cannot be attributed to a PRP, they were not included in the Waste-In List.

5. Determination of Proxy Values From the Accounts Receivable Ledgers

TechLaw calculated a proxy value to convert the dollar amount in the CRS AR ledgers to a volume of waste in gallons. TechLaw compared entries from the AR ledgers to the DI entries to determine a proxy value. Entries from both documents which could potentially refer to the same shipment of waste were used in the calculations. The following assumptions were used when comparing entries from the two documents:



- If the date of the CRS accounting transaction was the exact same date as the CRS DI entry, it was assumed to refer to the same shipment. TechLaw entered the matching transactions into Table 3 to use in determining proxy values.
- If the date of the CRS accounting transaction was within several (five) days of the CRS DI entry and appeared to be a reasonable dollar amount for the volume of the shipment, TechLaw entered the value into Table 3. 'Reasonable' would be similar dollar amounts for similar volumes of waste.
- Many accounting transactions in the CRS records included drum charges, sludge disposal or miscellaneous charges. To determine proxy values, TechLaw divided the total AR charge by the total volume of waste from the DI entry rather than breaking out the itemized charges. This was done because records from March 1976 and earlier only include a breakdown for drum/cleaning and not sludge disposal.
- In several cases, a CRS accounting transaction appears on the exact same date, or within several days of several CRS DI entries. In these instances, TechLaw assumed that the dollar amount referred to the cost of the combination of the shipments. To calculate the proxy values, TechLaw divided the dollar amount by the total volume of both shipments. Specific companies with examples of this are: Ashland Chemical, C & C Supply Company, Dexter Corporation, and N S Marketing.
- Similarly, CRS accounting transactions occasionally appeared on the exact same date, or within several days of CRS DI entries indicating one shipment of waste and one shipment of empty drums being returned. In these instances, TechLaw assumed that the dollar amount referred to both transactions. To determine proxy values, the dollar amount was used only in calculating values for the shipment of waste. Returned empty drums were not used in the calculation of proxy values. Specific companies with examples of this are: Beaver Paint Company (two transactions of this type) and Dexter Corporation.
- Several transactions in CRS accounting records indicated a combination of the two instances listed directly above, where one accounting transaction referred to two shipments of waste and one shipment of empty drums being returned. In these instances, it was assumed that the dollar amount referred to all three transactions. To calculate the proxy values, the dollar amount was divided by the total volume of the shipments of waste, and the returned empty drums were not used in the calculation. Examples of these circumstances are: J C Whitlam Manufacturing and Taylor Metal.
- Following the comparison of quantities present in the DI to transactions from the accounting records, a limited amount of data points were disqualified. The data points that were disqualified are included on the attached Table 4. Generally, data was omitted if there was no quantity specified in the DI or if the transactional value was a statistical outlier. A simple Standard Score (Z-score) statistical test was employed to determine the outliers. A data point was considered an outlier if a given value was within two standard deviations of the mean.

Table 3 contains all transactions that were used in calculating the proxy value used to convert the dollar amount from AR transactions to a volume of waste in gallons. As discussed in Section 3



above, the conversion factors developed during review of 104(e) responses were also utilized in the calculation of the AR proxy value, as detailed in Table 1.

Those AR and 104(e) response transactions that were used in the proxy value calculation were removed from the Waste-In List to avoid redundant entries of the same shipment of waste. The final proxy value used to convert AR dollar amounts to gallons was \$0.67 per gallon. For all other AR transactions, the total amount was multiplied by \$0.67 which resulted in a total amount of gallons per transaction. This amount is reflected in the Waste-In List.

6. Payment Journal Volumetric Calculations

TechLaw also entered transactions from the Purchase Payment (PP) Journals into the Waste-In List. Only those transactions indicating a charge for Scrap Solvent for Reclamation were included. For these transactions, both the total amount and the scrap solvent charge were entered into the Waste-In List. These entries are identified by "PP" in the Waste-In List.

Similarly, TechLaw entered transactions from the Cash Payment Journals which indicated a charge for Scrap Solvent for Reclamation into the Waste-In List. These entries are identified by "CP" in the Waste-In List. The following assumptions were made when entering Payment Journal transactions into the Waste-In List:

- Cash Payment records dating from 1970-1973 contain "Material" charges and do not contain a category for "Scrap Solvent for Reclamation." Based upon a review of the accounting records from later years, it was determined that material transactions were most likely equivalent to scrap solvent entries and therefore were entered as scrap solvent transactions. This was supported by the fact that the scrap solvent category was added to the accounting records in April 1975, the same month the material column was removed from the CRS accounting records.
- Entries from 1/14/75 and 3/11/75 were also entered as "Material" with a note "For Reclam." These entries were considered to be scrap solvent for reclamation transactions.
- A total of three entries were designated as credits: American Chemsol (1/13/78), National Can (10/30/78), and Owens Illinois (8/23/79). These credit entries were omitted from the Waste-In List.

7. Determination of Proxy Values from the Payment Journals

TechLaw also calculated a proxy value to be used to convert the scrap solvent for reclamation charges in the Purchase Journals to volume of waste in gallons. TechLaw compared entries from the Purchase Journals to the DI entries to determine a proxy value. Entries from both documents which could potentially refer to the same shipment were used in the calculations. The following assumptions were used when comparing entries from the two documents:



- Only entries from the PP Journals that indicated a charge for “Scrap Solvent for Reclamation” or “Material” were considered in the comparison to the DI entries.
- PP entries with the same company name, listed within the same time period as the DI date, and for charges with similar dollar amounts for similar volumes of waste were entered into Table 5.
- A proxy value was calculated by dividing the total amount listed in the PP entries (which was the same as the “Scrap Solvent for Reclamation” charge) by the total gallons listed in the DI entries.
- In several cases, one PP entry could potentially match with several DI entries. The multiple DI entries were compared to determine which DI entry best corresponded to the PP match. This determination was based on similar transactional values by the PRP in question and other PRPs.
- Similarly, several PP entries could potentially match with one DI entry. The multiple PP entries were compared to determine which entry best corresponded to the DI entry. This determination was based on similar transactional values by the PRP in question and other PRPs.

Table 5 contains all transactions that were used in calculating the proxy value used to convert the scrap solvent for reclamation charges from the PP Journals to a volume of waste in gallons. Those PP Journal transactions that were used in the proxy value calculation were removed from the Waste-In List to avoid redundant entries of the same shipment of waste.

For several PRPs, a specific conversion factor was calculated to convert the scrap solvent for reclamation charges to gallons. The following PRP-specific conversion factors were calculated: \$0.40 per gallon for Fasson and \$0.11 per gallon for Sprayon. These PRPs were found to have a general trend in the comparison of data from the DI lists to the PP journals and had a sufficient amount of supportive transactional information. TechLaw converted all other scrap solvent for reclamation transactions to gallons using the default proxy value of \$0.18 per gallon. TechLaw divided each scrap solvent for reclamation charge by the appropriate proxy value to determine the volume of waste in gallons for each transaction. This amount is reflected in the Scrap Solvent for Reclamation Waste-In List.

8. Normalizing PRP Name

To sort data, TechLaw added an additional field to the Waste-In List to standardize the company names. This standardization was used to correct slight nuances in the way a company name was spelled in CRS site records and to consolidate entries for companies with subsidiaries and/or other aliases. The following assumptions were made when normalizing the PRP name:

- Allegheny Solvents was normalized under Chemcentral due to corporate research and information provided in their 104(e) response.
- Ashland Oil & Refining was assumed to be the same as Ashland Chemical Co.
- Ashland Rubber Products was assumed to be separate from Ashland Chemical Co.



- Astlett Balata Refining was assumed to be separate from Astlett & Co., Inc.
- Beaver Paint Products was assumed to be the same as Beaver Paint Co.
- C & C Supply Co. occasionally had an additional company name listed on the CRS DI or accounting entry. For example: C & C Supply Co. - Hobart, C & C Supply Co. - Kenner, C & C Supply Co. - Masonite and C/C Supply Co. (Masonite). These entries were normalized under the second PRP name (not C & C Supply).
- Five out of the nine entries for Don Cain included C & C Supply Co. Therefore, it was assumed that Don Cain was a representative of C & C Supply. All entries for Don Cain were normalized under the C & C Supply Co. PRP name.
- Dowell Div. - Youngstown and Jamestown Finishes Division were listed under Dow Chemical due to corporate research and information provided in their 104(e) response.
- Six out of the eight entries for Essex Chemical Company included Jamestown Finishes. Therefore, these entries appear to refer to Jamestown Finishes, which ultimately went to Dow Chemical. Therefore, TechLaw consolidated all Essex Chemical entries under Dow Chemical.
- One CRS entry read Ernie Roberts-Masonry Seal. TechLaw assumed Ernie Roberts was a representative of Masonry Seal, and, therefore, this entry was listed under Masonry Seal Corp.
- Fasson was listed under Avery Dennison due to corporate research and information provided in their 104(e) response.
- H.A. Astlett & Co. was assumed to be separate from Astlett & Co., Inc.
- Hauserman Co. was assumed to be the same as E. F. Hauserman Co. The single entry had a similar transaction to the E. F. Hauserman transactions.
- Hysol Division-Dexter was listed under Hysol Division.
- Industrial Alkali was listed under Industrial Chemical Corp. due to corporate research.
- Koppers & Company, Inc. and Parr, Inc. were normalized under Beazer East due to corporate research.
- Mr. Bob Schuman was assumed to be a representative of Masonry Seal Corp. "Mesantry Seal (sic)" was included in parentheses after his name in the single entry.
- Majestic Paint was assumed to be separate from Yenkin Majestic.
- Four of the five entries for Mr. Carl Scheau contained "Ohio Formulators" after his name. Therefore, it was assumed that he represented Ohio Formulators.
- Ohio Polychemical was listed under Yenkin Majestic due to information provided in their 104(e) response.
- Penn-oil Pressure Seal was listed under Masonry Seal Corp. "Masonry Seal (sic)" was included in parentheses after the company name.
- Sprayon Products was listed under Sherwin Williams Co. due to information provided in their 104(e) response.
- Union Carbide was normalized under Dow Chemical due to information provided in their 104(e) response.
- Victor Golf was combined with Victor Comptometer Corp. The company is now recognized as Victor Comptometer-Golf.



**CHEMICAL RECOVERY SYSTEMS
UPDATED PRP ADDRESS LIST
LAST UPDATED 9/24/02**

- | | |
|---|---|
| 1. 3 M Corp.
Attn.: Brian Davis
P.O. Box 33428
St. Paul, MN 55133-3428 | 9. American Colors, Inc.
Attn: Jim Sayre
1110 Edgewater Drive
Sandusky, OH 44870 |
| 2. Black McCuskey Souers & Arbaugh
Attn: Victor Marsh
1000 United Bank Plaza
220 Market Avenue South
Canton, OH 44702-2116 (re: Adelphia) | 10. American Greetings Corp.
Attn: Michelle Creger
One American Road
Cleveland, OH 44144-2938 |
| 3. Parker Hannifin
Airborne Division
Attn: Chris Burich
6035 Parkland Blvd
Cleveland, OH 44124-4141 | 11. Ashland Chemical, Inc.
Robin Lampkin-Isabel
P.O. Box 2219
Columbus, OH 43216 (re: Cleveland, OH) |
| 4. KOA Speer Electronics
f/k/a Airco Speer Electronics
Bolivar Drive, PO Box 547
Bradford PA 16701 | 12. Ashland Chemical, Inc.
Robin Lampkin-Isabel
P.O. Box 2219
Columbus, OH 43216 (re: Freedom, PA) |
| 5. Allegheny Label Co.
1224 Freedom Road
Cranberry Township, PA 16066 | 13. Ashland Chemical, Inc.
Robin Lampkin-Isabel
P.O. Box 2219
Columbus, OH 43216 (re: Dayton, OH) |
| 6. Chemcentral
f/k/a Allegheny Solvents & Chemical
P.O. Box 730
Bedford Park, IL 60499-0730 | 14. Ashland Chemical, Inc.
Robin Lampkin-Isabel
P.O. Box 2219
Columbus, OH 43216 (re: Akron, OH) |
| 7. Foley and Lardner
Attn: Tanya O'Neill
777 E Wisconsin Ave.
Milwaukee, WI 53202-5367
(re: Allis Chalmers) | 15. Astatic Corp.
P.O. Box 120
Conneaut, OH 44030 |
| 8. US Steel Corporation
Attn: Miles Stipanovich
600 Grant Street, Room 1500
Pittsburgh, PA 15219-2800 (re:Alside) | 16. Auto & Industrial Finishes
Attn: Kevin R. Kehoe
9070 Marshall Road
Cranberry Township, PA 16066 |

17. Squire, Sanders & Dempsey L.L.P
Attn: Douglas McWilliams
4900 Key Tower
127 Public Square
Cleveland, OH 44114-1304 (re: Avery Label)
18. Thompson Hine
Attn: Heidi Goldstein
3900 Key Center
127 Public Square
Cleveland, OH 44114-1291 (re:BF Goodrich)
19. McGregor & Patterson
Attn: J Russell McGregor
105 Smithfield Street, Suite 200
Pittsburgh, PA 15222
(re: Ball/Ranbar/BBT)
20. Squires Sanders & Dempsey
Attn: Vincent Atriano
1300 Huntington Center
41 South High Street
Columbus, OH 43215 (re: Barr, Inc.)
21. Basic Packaging Machinery Corp.
642 Sugar Lane
Elyria, OH 44035
22. Walton Paint Company
d/b/a Beaver Paint Company
Attn: Joseph Walton
108 Main Street
Jamestown, PA 16134
23. Thompson Hine
Attn: Andrew Kolesar
312 Walnut Street, 14th floor
Cincinnati, OH 45202-4029
(re: Berenfield Steel Drum)
24. Black McCuskey Souers & Arbaugh
Attn: Victor Marsh
1000 United Bank Plaza
220 Market Avenue South
Canton, OH 44702-2116 (re: Bison)
25. Vorys, Sater, Seymour and Pease
Attn: Joe Blasko
52 East Gay Street
Columbus, OH 43216-1008
(re: Borden Chemical)
26. Borg Warner
Attn: Stephanie Bransfield
200 South Michigan Avenue
Chicago, IL 60604
27. Lathrop & Gage
Attn: Jonathan Haden
2345 Grand Blvd., Ste 2800
Kansas City, MO 64108-2612 (re: BFI)
28. Whyte, Hirschboeck & Dudek
Attn: Jennifer Buzacky
111 East Wisconsin Ave., Ste 2100
Milwaukee, WI 53202 (re: Bucyrus Erie)
29. Bud Industries, Inc.
Attn: Ravi Jain
P.O. Box 998
Willoughby, OH 44096
30. Aztec Peroxides, Inc.
f/k/a Carmac Chemical
555 Garden Street
Elyria, OH 44035
31. David B. Graham
Baker & Hostetler LLP
1900 East 9th Street
Cleveland, OH 44114-3485
(re: Celanese)
32. Checkmate Boats
3691 State Route 4
Bucyrus, OH 44820
33. McDermott, Will & Emery
Attn: Louis Rundio, Jr.
227 W. Monroe St.
Chicago, IL 60606 (re: Chemcentral)

34. Doepken Keevican & Weiss, P.C.
Attn: Terry L. Schnell
58th Floor, USX Tower
600 Grant Street
Pittsburgh, PA 15219-2703 (re: Chemical Dist.)
35. Chemical Recovery Systems, Inc.
Attn: Peter Shagena
42714 Woodward Avenue, Suite A
Bloomfield Hills, MI 48304-5061
36. Waste Management
f/k/a Chem-Trol Pollution Control Services
Attn: James Forney
3970 Heritage Avenue
Okemos, MI 48864
37. Chemtron Corp.
Attn: Richard Timm
35850 Schneider Ct.
Avon, OH 44011
38. Howard & Howard
Attn: Gary Peters
39400 Woodward Avenue, Suite 101
Bloomfield Hills, MI 48304-5151
(Re: Chrysler Plastics)
- DaimlerChrysler Corporation
f/k/a Chrysler Plastic Products Co.
Attn: Kathleen Hennessey, CIMS 485-13-62
1000 Chrysler Drive
Auburn Hills, MI 48236-2808
39. Ingersoll-Rand
Attn: Donna McMahon
200 Chestnut Ridge Road
Woodcliff Lake, NJ 07677
(re: Clark Equipment)
40. Clyde Paint & Supply Co.
Gerald F. Thomas, Registered Agent
301 Lisa Ann Drive
Huron, OH 44839
41. Cytec Industries, Inc.
Attn: Thomas Waldman
Five Garret Mtn Plaza
West Paterson, NJ 07424
(re: Conap, Inc.)
42. Conneaut Leather, Inc.
Attn: Howard Bartow
4114 Carpenter Road
Ashtabula, OH 44004
43. Dwyer, Kinburn, Hall & Golub
Attn: Terrence Dwyer
16 Furler Street
Totowa, NJ 07511-0437
(re: Continental Can/Kiewit)
- Crown Cork & Seal
f/k/a Continental Can
Attn: William Gallagher
One Crown Way
Philadelphia, PA 19154
44. Cuyohoga Chemical Company
Attn: Paul Moffat
3470 West 140th Street
Cleveland, OH 44111-2431
45. Thompson Hine
Attn: Michael Cyphert
3900 Key Center
127 Public Square
Cleveland, OH 44114-1291
(re: DeSantis Coatings)
46. Baker & Hostetler, LLP
Attn: Jason Perdion
3200 National City Center
1900 East 9th Street
Cleveland, OH 44114-3485
(re: Dorn Color)
47. Dow Corning Corporation
Attn: Barbara Rather (#CO1242)
2200 West Salzburg Road
Midland, MI 48686-0994

48. E.I. duPont de Nemours
f/k/a DuPont Chemical
Attn: Barbara Gravely, D-7083
1007 Market Street
Wilmington, DE 19898
49. Kovitz Shifrin & Waitzman
Attn: Richard Hillsberg
750 Lake Cook Road, Suite 350
Buffalo Grove IL 60089 (re: Eagle Rubber)
- Alan Plotkin
18 East 48th Street, Floor 18
New York, NY 10017 (re: Eagle Rubber)
50. Eastman Kodak
Attn: Elliott Stern
343 State Street
Rochester, NY 14650-0217
51. Centria
f/k/a Elwin G. Smith
1005 Beaver Grade Road
Coraopolis, PA 15108
- Frost Brown Todd, LLC
Attn: Steven Wesloh
2200 PNC Center
201 East Fifth Street
Cincinnati OH 45202
(Re: EG Smith/AK Steel)
52. Elyria Foundry
Attn: Samuel Knezevic
120 Filbert Street
Elyria, OH 44036
- Chromalloy American Corp.
f/k/a Elyria Foundry
120 S Central Ave.
St Louis, MO 63105
53. Dow Chemical Co.
f/k/a Essex Chemical-Jamestown Finishes
Attn: Tracy Goad Walter
2030 Dow Center
Midland, MI 48676
54. FBC Chemical Corporation
Attn: Lad Hudac
P.O. Box 599
Mars, PA 16046
55. Squire, Sanders & Dempsey L.L.P
Attn: Douglas McWilliams
4900 Key Tower
127 Public Square
Cleveland, OH 44114-1304 (re: Avery/Fasson)
56. Joondeph & Bittel
Attn: Dale Wilson
50 South Main Street, Suite 700
Akron, OH 44308 (re: Ferriot Bros)
57. Hanna, Campbell & Powell
Attn: David Moss
3737 Embassy Parkway
P.O. Box 5521
Akron, OH 44334 (re: Firestone)
- Jones, Day, Reavis & Pogue
Attn: Heidi Hughes Bumpers
901 Lakeside Ave.
Cleveland, OH 44114-1190 (re: Firestone)
58. Mattel, Inc.
f/k/a Fisher Price Toys
Attn: Gregg Clark
333 Continental Blvd.
El Segundo, CA 90245-5012
- Morrison & Foerster
Attn: Peter Hsiao
555 West Fifth Street
Los Angeles, CA 90013 (re: Fisher Price Toys)

59. Ford Motor Company
Attn: Kathy Hofer
Parklane Towers West Ste 1500
Three Parklane Blvd.
Dearborn, MI 48126-2568
60. Foseco, Inc.
Attn: Frank Simcic
20200 Sheldon Road
Cleveland, OH 44142 (re: Brookpark)
61. Foseco, Inc.
Attn: Frank Simcic
20200 Sheldon Road
Cleveland, OH 44142 (re: Conneaut)
62. Vorys, Sater, Seymour and Pease
Attn: Martyn Brodnik
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
(re: Franklin Int'l/Glue)
63. General Electric Company
Attn: Michael Elder
320 Great Oaks Office Park, Ste. 323
Albany, NY 12203
- Young Sommer LLC
Attn: Dean Sommer
Five Palisades Drive
Albany, NY 12205
(re: General Electric)
64. General Motors
Attn: Linda Bentley (MC 482-C24-D24)
300 Renaissance Center
Detroit, MI 48243 (re: Lordstown)
65. Continental General Tire
f/k/a General Tire
Attn: Ralph McCormick
1800 Continental Blvd.
Charlotte, NC 28273
66. Glidden Co.
Attn: Robert Kovalak
925 Euclid Avenue, Suite 900
Cleveland, OH 44115
67. Goodyear Tire & Rubber Co.
Attn: Neal Rountree
1144 E. Market Street
Akron, OH 44316
68. Reale & Fossee
Attn: C.S. Fossee
625 Stanwix Street, Ste 2405
Pittsburgh, PA 15222 (re: Gordon Terminal)
69. GLS Corporation
Attn: Nancy Dehmlow (Great Lakes Terminal)
P.O. Box 3208
Arlington Heights, IL 60006-3208
70. Centria
f/k/a H.H. Robertson
1005 Beaver Grade Road
Coraopolis, PA 15108
- McDermott, Will & Emery
Attn: Colleen E. Baime
227 West Monroe
Chicago, IL 60606
(Re: H.H. Robertson)
71. Goldberg, Stinnett, Meyers & Davis
Attn: Katherine Ray
44 Montgomery St., Ste 2900
San Francisco, CA 94104 (re: Hexcel)
- Hexcel Corporation
Attn: A. William Nosil
11711 Dublin Boulevard
Dublin, CA 94568
- David B. Graham
Baker & Hostetler LLP
1900 East 9th Street
Cleveland, OH 44114-3485
(re: Hexcel)

72. ITW Food Equipment
Attn: Steve Adams
701 S Ridge Avenue
Troy, OH 45374 (re: Hobart/Grove City)
73. ITW Food Equipment
Attn: Steve Adams
701 S Ridge Avenue
Troy, OH 45374 (re: Hobart/Dayton)
74. Black McCuskey Souers & Arbaugh
Attn: Victor Marsh
1000 United Bank Plaza
220 Market Avenue South
Canton, OH 44702-2166
(re: Hoover Company)
75. Calfee, Halter & Griswold LLP
Attn: Susan Strom
1400 McDonald Investment Center
800 Superior Avenue
Cleveland, OH 44114-2688 (re: Hukill)
76. Henkel Corporation
f/k/a Dexter Corp./Dexter-Hysol
Attn: Kevin Chu
2200 Renaissance Blvd.
Gulph Mills, PA 19406

Kenneth Arnold
49 Valley Drive-Suite 200
Furlong, PA 18925 (re: Henkel/Dexter)

Akzo Nobel Inc.
Attn: Brian Curtis
300 South Riverside Plaza, Suite 2200
Chicago, IL 60606 (re: Dexter Corp.)
77. Industrial Chemical Corp.
f/k/a Industrial Alkali
885 W Smith Rd.
Medina, OH 44256
78. J. C. Whitlam Manufacturing Co.
Attn: Steve Carey
P.O. Box 380
Wadsworth, OH 44282-0380
79. Jamestown Paint & Varnish Co.
Attn: Joseph Walton
108 Main Street
Jamestown, PA 16134
80. Kalcro Coatings Co.
Attn: Newton Zucker
37721 Stevens Blvd.
Willoughby, OH 44094
81. Foley, Hoag & Eliot
Attn: Monica Conyngham
One Post Office Square
Boston, MA 02109
(Re: Kenner/Hasbro)
82. Shumaker, Loop & Kendrick
Attn: Jeffrey Fort
1000 Jackson
Toledo, OH 43624
(re: Lake Shore Industries)
83. Liberty Solvents & Chemical Co.
Attn: Raymond Pasquali
9429 Ravenna Road
Twinsburg, OH 44087
84. BASF Corporation
Attn: Harry Baumgartner
3000 Continental Drive - North
Mount Olive NJ 07828
(re: BASF/Limbacher)
85. Jones, Day, Reavis & Pogue
Attn: John Rego
901 Lakeside Ave.
Cleveland, OH 44114-1190
(re: Lorain Products)

86. Babst, Calland, Clements & Zominir
Attn: Michele Gutman
Two Gateway Center
Pittsburgh, PA 15222 (re: Luxaire)

VIACOM Inc.
Attn: Linda Kelley
MC745
11 Stanwix Street
Pittsburgh, PA 15222-1384 (re: Luxaire)
87. Kahn, Kleinman, Yanowitz & Arnson
Attn: James Koewler
1301 East Ninth Street, Suite 2600
Cleveland, OH 44114-1824
(re: Mahoning Paint)
88. McMahon, DeGulis, Hoffman & Lombardi
Attn: Gregory DeGulis
812 Huron Road, Ste 650
Canton, OH 44115-1126
(re: Mameco International)
89. USG
f/k/a Marlite
125 South Franklin
Chicago, IL 60606
90. International Paper Company
f/k/a Masonite Corporation
Attn: Mr. Joseph Saab
Tower II
6400 Poplar Ave.
Memphis, TN 38197
91. Miller Studio, Inc
Attn: John Basiletti
P.O. Box 997
New Philadelphia, OH 44663

Lundgren Goldthorpe & Zumbar
Attn: Andrew Zumbar
526 East Main Street
Alliance, OH 44601-0595
(re: Miller Studio)
92. Exxon Mobil
Attn: Steven Schmidt
Pegasus Plaza, Room 5a39
3000 Pegasus Park Drive
Dallas, TX 75247 (re: Mobil Chemical)
93. Warren and Young
Attn: Stuart Cordell
134 W 46th Street
Ashtabula, OH 44005-2300
(re: Molded Fiberglass)
94. National Acme
170 E. 131st Street
Cleveland, OH 44108
95. Rexam Beverage Can Americas
f/k/a National Can
Attn: Frank Brown
4201 Congress Street, Suite 340
Charlotte, NC 28209
96. Neville Chemical Company
Attn: Thomas McKnight
2800 Neville Road
Pittsburgh, PA 15225-1496
97. NCC Incorporated
f/k/a Nolwood Chemical
Attn: Arthur McWood, Jr.
42714 Woodward Avenue, Suite A
Bloomfield Hills, MI 48304-5061

PVS Chemicals, Inc./Nolwood Chemical
Attn: Jonathan Taub
10900 Harper Avenue
Detroit, MI 48213
98. Nordson Corporation
Attn: Robert Veillette
28601 Clemens Road
Westlake, OH 44145

99. Philip Services
Attn: Michael Chimitris
9700 Higgins Road, Suite 750
Rosemont, IL 60018 (re: Nortru)
100. Day, Berry & Howard
Attn: Tricia Haught
CityPlace I
Hartford, CT 06103-3499 (re: Ohio Brass)
101. Thomas Pannett
Ohio Attorney General's Office
140 East Troy St., 12th floor
Columbus, OH 43215-4132 (re: Ohio DOT)
102. Yenkin Majestic Paint Corporation
Ohio Polychemical Division
Attn: Merom Brachman
1920 Leonard Avenue
Columbus, OH 43219
103. Thompson Hine
Attn: Heidi Goldstein
3900 Key Center
127 Public Square
Cleveland, OH 44114-1291
(re: Owens Illinois)
104. P & K Oil Service, Inc.
PO Box 22024
Beachwood, OH 44122-0024
105. FirstEnergy
Attn: Douglas Weber
76 South Main St
Akron, OH 44308
(re: Painesville Nuc. Pwr)
106. Pfizer, Inc.
f/k/a Parke-Davis & Company
Attn: Michael McThomas
235 E. 42nd St.
New York, NY 10017
107. Beazer East, Inc.
f/k/a Parr, Inc/Koppers & Co. Inc.
One Oxford Centre, Suite 3000
Pittsburgh, PA 15219
108. Plas-Tanks Industries, Inc.
Attn: J. Kent Covey
39 Standen Drive
Hamilton, OH 45015
109. Valspar
Attn: Ronda Bayer
1101 S Third St.
Minneapolis, MN 55415 (re: Plasti-Kote)
110. PPG Industries
Attn: Paul King
One PPG Place
Pittsburgh, PA 15272 (re: Cleveland)
111. PPG Industries
Attn: Paul King
One PPG Place
Pittsburgh, PA 15272 (re: Springdale PA)
112. PPG Industries
Attn: Paul King
One PPG Place
Pittsburgh, PA 15272 (re: Circleville, OH)
113. Amer Cunningham Co.
Attn: Michael S. Urban
159 S. Main St.
Akron, OH 44308-1322
(re: Quality Synthetic Rubber)
114. Scott Fetzer Company
f/k/a Quikut
Attn: Patricia Scanlon
28800 Clemens Road
Westlake, OH 44145-1197

Jones, Day, Reavis & Pogue
Attn: Thomas Hamilton
901 Lakeside Avenue
Cleveland, OH 44114-1190 (re: Quikut)

115. R. W. Beckett Corp.
Attn: Donald Brackenhoff
P.O. Box 1289
Elyria, OH 44036-1289
116. LTV Steel
f/k/a Republic Steel
Attn: T.A. Zalenski
200 Public Square
Cleveland, OH 44114-2308
117. Babst, Calland, Clements, Zomnir
Attn: Kevin Garber
2 Gateway Center
Pittsburgh, PA 15222 (re: Rexroth)
118. Ross Incineration Services, Inc.
f/k/a Robert Ross & Son's, Inc.
36790 Giles Rd.
Grafton, OH 44044
- Wickens, Herzer, Panza Cook & Batista
Attn: Richard Panza
35765 Chester Road
Avon OH 44011-1262
(re: Robert Ross & Sons)
119. Rockwell International
Attn: Gary Ballesteros
777 E Wisconsin Ave., Ste 1400
Milwaukee, WI 53202
120. Shell Oil Company
Attn: Mary Smith, Room 4881 OSP
P.O. Box 2463
Houston, TX 77252-2463
121. Sherwin Williams Co.
Attn: Allen Danzig
101 Prospect Avenue NW
Cleveland, OH 44115-1075 (re: Mayfield Village)
122. Sherwin Williams Co.
Attn: Allen Danzig
101 Prospect Avenue NW
Cleveland, OH 44115-1075 (re: Cincinatti)
123. Honeywell
f/k/a Sinclair & Valentine
Attn: Heleen Schiller
P.O. Box 2245
Morristown, NJ 07962-2245
124. Sherwin Williams Co.
Attn: Allen Danzig
101 Prospect Avenue NW
Cleveland, OH 44115-1075 (re: Sprayon)
125. Moen
f/k/a Stanadyne, Inc
Attn: Dennis McKinney
25300 Al Moen Drive
North Olmsted, OH 44070-8022
126. LeBoeuf, Lamb, Greene & McRae
Attn: Patricia Shaw
One Gateway Center
420 Fort Duquesne Blvd., Ste 1600
Pittsburgh, PA 15222-1437 (re: Stolle Corp.)
127. LeBoeuf, Lamb, Greene & McRae
Attn: Patricia Shaw
One Gateway Center
420 Fort Duquesne Blvd., Ste 1600
Pittsburgh, PA 15222-1437 (re: Stolle Prod.)
128. Superior Screw
P.O. Box 92046
Elk Grove, IL 60009
129. Vorys, Sater, Seymour and Pease
Attn: Scott Doran
52 East Gay Street
Columbus, OH 43216-1008 (re: Taylor Metals)
130. Cotsirilos, Tighe & Streicker, Ltd.
Attn: Ann Tighe
33 North Dearborn Street, Suite 600
Chicago, IL 60602
(re: Technical Products Inc.)

131. Dean & Fulkerson
Attn: James O'Brien
801 West Big Beaver Road, Suite 500
Troy, MI 48084
(re: Tecumseh Products Co.)
132. Hanna, Campbell & Powell
Attn: David Moss
3737 Embassy Parkway
P.O. Box 5521
Akron, OH 44334 (re: Temperature Controls)
133. ShawPittman
Attn: Jeffrey Knight
2300 N Street NW
Washington, DC 20037 (re: Therm-o-Disc)
134. Babst, Calland, Clements Zomnir
Attn: Lindsay Howard
Two Gateway Center
Pittsburgh, PA 15222
(re: Thomas Steel Strip Corporation)
135. TRW
Attn: Timothy O'Neill
1900 Richmond Road
Cleveland, OH 44124 (re: Ross Gear)
136. TRW
Attn: Timothy O'Neill
1900 Richmond Road
Cleveland, OH 44124 (re: Valve Division)
137. U.S. Chemical
Attn: Andrew Lesko
600 Nova Drive SE
Massillon, OH 44648-0709
138. Dow Chemical Co.
f/k/a Union Carbide Corp.
2030 Dow Center
Midland, MI 48674
139. Crompton
Attn: Jeffrey Bailot/Pamela Missal
Benson Road
Middlebury, CT 06749 (re: Uniroyal)
- Michelin NA
Attn: James Fannin
P.O. Box 19001
One Parkway South
Greenville, SC 29615 (re: Uniroyal)
- Uniroyal Technology Corp.
f/k/a Uniroyal Plastics
Attn: Oliver Janney
2 North Tamiami Trail #900
Sarasota FL 34236-5568
140. Fulbright & Jaworski
Attn: Eva Fromm O'Brien
1301 McKinney, Suite 5100
Houston, TX 77010
(re: Universal Cooperatives)
141. Tommy Armour Golf
f/k/a Victor Comptometer-Golf
8350 North Lehigh Avenue
Morton Grove, IL 60053
142. Doepken Keevican & Weiss, P.C.
Attn: Terry L. Schnell
58th Floor, USX Tower
600 Grant Street
Pittsburgh, PA 15219-2703 (re: W.J. Ruscoe)
143. Whirlpool Corp. - Clyde Division
Attn: Larry Yinger
2000 N M-63
Benton Harbor, MI 49022-2692
144. Whirlpool Corp. - Findlay Division
Attn: Larry Yinger
2000 N M-63
Benton Harbor, MI 49022-2692

145. . Buckingham, Doolittle & Burroughs
Attn: Ralph Amiet
50 S Main Street
Akron, OH 44309-1500 (re: Wooster Brush)

146. Yenkin Majestic Paint Corporation
Attn: Merom Brachman
1920 Leonard Avenue
Columbus, OH 43219

Remedial Enforcement Support Sect.
77 West Jackson Blvd.
Chicago IL 60604 (re: CRS)

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FOE

Basic Packaging Machinery Corp.
642 Sugar Lane
Elyria, OH 44035



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S

- ☐ INSUFFICIENT ADDRESS
☐ ATTEMPTED NOT KNOWN
☐ NO SUCH NUMBER/ STREET
☒ NOT DELIVERABLE AS ADDRESSED
☐ UNABLE TO FORWARD

☐ OTHER

RTS
RETURN TO SENDER

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OCT 29 2002
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